

EXHIBIT 11

L.E.,
Plaintiff,
v.
BILL LEE, et al.,
Defendants.

4. TSSAA is governed by two governing bodies, each of which consists of twelve (12) members elected by the member schools. The Legislative Council is responsible for writing and amending the Bylaws of the Association. The Board of Control is responsible for administering those Bylaws. The Executive Director is employed by the Board of Control and is responsible for the day-to-day administration of the organization.

5. The Tennessee Middle School Athletic Association (TMSAA) is an unincorporated affiliate of TSSAA. The TMSAA does not have separate governing authorities from TSSAA. The TMSAA is governed by the TSSAA Legislative Council and Board of Control, and the TSSAA Executive Director is responsible for the day-to-day administration of the TMSAA. The TMSAA Constitution and Bylaws are available on TSSAA's website at <https://cms-files.tssaa.org/documents/tssaa/2021-22/handbook/2021-22TMSAABylaws.pdf>.

6. TSSAA has routinely allowed girls to participate in boys' sports as long as they played by the same rules (e.g., girls playing on the boys' golf team must play from the same tees from which the boys play). Consequently, the participation of transgender boys in interscholastic athletics would have posed no issue for TSSAA in the absence of state law prohibiting such participation.

7. TSSAA does not have any information regarding any instance where a transgender girl has sought eligibility to participate in girls' interscholastic sports at a Tennessee middle school or high school. Several years ago TSSAA developed a Transgender Policy (Exhibit A to the Complaint) in order to deal with such participation should the issue arise; but TSSAA has not been presented with an eligibility issue that called for the use of that Policy.

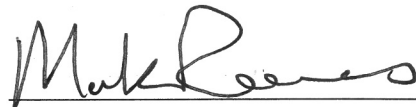
8. TSSAA had no expenditures in relation to S.B. 228. TSSAA had no involvement in the passage of that Act and took no position relative to it. TSSAA does not receive funding

from advocacy organizations. Other than a small sponsorship agreement with the Tennessee Highway Safety Office, TSSAA does not receive any State funds.

9. TSSAA has no documents responsive to the subpoenas served on TSSAA and TMSAA other than the TSSAA and TMSAA Constitution and Bylaws and the Transgender Policy referenced above.

I declare under penalty of perjury that the foregoing statements are true.

Dated this 13th day of July, 2022.


Mark Reeves